

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v.

Civil Action No. 3:17-01362
Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

v.

Civil Action No. 3:17-01665
Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

**NOTICE OF REMOTE 30(b)(6) DEPOSITION OF
GOVERNOR'S COUNCIL ON SUBSTANCE ABUSE PREVENTION & TREATMENT**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and the Deposition Protocol governing this litigation, Defendant Cardinal Health, Inc., by and through counsel, hereby give notice that the remote, oral videotaped deposition will be taken of one or more officers, directors, managing agents, or other persons designated by Governor's Council on Substance Abuse Prevention & Treatment on August 13, 2020, beginning at 9:00 a.m. Eastern Time. The deposition shall be videotaped and recorded stenographically and will be conducted before a notary public or other person authorized to administer oaths. The oral examination is to be taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States

District Court for the Southern District of West Virginia, and the Deposition Protocol. Court reporting services and video recording services will be provided by Veritext Legal Solutions (216-523-1313; opioid@veritext.com), who will provide remote access for all parties wishing to participate via video conference or telephone.

PLEASE TAKE FURTHER NOTICE that the Deponent must have access to a laptop, computer, or tablet with web camera capability. Deponent may not use a cell phone to provide testimony. Deponent must also have the capability to view documents electronically. To the extent Deponent is not in possession of the required technology, documents shall be provided to the Deponent in hard copy and/or Deponent's counsel shall provide the required technology.

Recommended Specifications are below:

- i. Computer
- ii. Web Camera
- iii. Internet Browser (Google Chrome Preferred)
- iv. Minimum 10 mb/s wired, secure internet connection

At minimum, Deponent must have sufficient internet connectivity and bandwidth to support a video deposition. Such capacity shall be sufficient to ensure that when used with the system selected for the deposition, there shall be (a) high-quality video upload (from Deponent) and download (to other Participants), (b) no material time discrepancy between audio and video, and (c) consistent connectivity, with no material disruptions.

Dated: August 11, 2020

Respectfully submitted,

/s/ Steven R. Ruby

Michael W. Carey (WVSB No. 635)
Steven R. Ruby (WVSB No. 10752)
David R. Pogue (WWVSB No. 10806)
Raymond S. Franks II (WVSB No. 6523)
CAREY, DOUGLAS, KESSLER & RUBY, PLLC
901 Chase Tower, 707 Virginia Street, East (25301)
P.O. Box 913
Charleston, West Virginia 25323
Telephone: (304) 345-1234
Facsimile: (304) 342-1105
mwcarey@csdlawfirm.com
sruby@cdkrlaw.com
drpogue@csdlawfirm.com
rfranks@cdkrlaw.com
Counsel for Cardinal Health, Inc.

Enu Mainigi
F. Lane Heard III
Ashley W. Hardin
WILLIAMS & CONNOLLY LLP
725 Twelfth Street NW
Washington, DC 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
emainigi@wc.com
lheard@wc.com
ahardin@wc.com
Counsel for Cardinal Health, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11th day of August, 2020, the foregoing “Notice of Remote 30(b)(6) Deposition of Governor’s Council on Substance Abuse Prevention & Treatment” was served using the Court’s CM/ECF system, which will send notification of such filing to all counsel of record, and via electronic mail to mdl2804discovery@motleyrice.com and track2opioiddefendants@reedsmit.com.

Dated: August 11, 2020

/s/ Steven R. Ruby
Steven R. Ruby (WVSB No. 10752)